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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

J. DOE 1 et al.,
Individual and Representative Plaintiffs,
v.
GITHUB, INC., et al.,
Defendants.

Case Nos. 4:22-cv-06823-JST
4:22-cv-07074-JST

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF ENTRY OF
[PROPOSED] STIPULATED
PROTECTIVE ORDER FOR
LITIGATION INVOLVING
PATENTS, HIGHLY SENSITIVE
CONFIDENTIAL INFORMATION
AND/OR TRADE SECRETS**

1 I, Joseph R. Saveri, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am a partner
3 and founder of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Does
4 1–4 in this action. I have personal knowledge of the matters stated herein and, if called upon, I
5 could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in
6 support of entry of the [Proposed] Stipulated Protective Order for Litigation Involving Patents,
7 Highly Sensitive Confidential Information and/or Trade Secrets (“Proposed Stipulated Protective
8 Order”), which is filed concurrently with this declaration.

9 2. Plaintiffs’ Proposed Stipulated Protective Order is identical to the Court’s Model
10 Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information
11 and/or Trade Secrets (“Model Order”) (available at [https://www.cand.uscourts.gov/forms/model-](https://www.cand.uscourts.gov/forms/model-protective-orders/)
12 [protective-orders/](https://www.cand.uscourts.gov/forms/model-protective-orders/)) except as set forth below in Paragraphs 3–4 below and shown in redline in
13 Exhibit 1, which is a tracked-changes version of the Proposed Stipulated Protective Order
14 showing changes from the Model Order.

15 3. In the Proposed Stipulated Protective Order, the parties have added case-
16 identifying information and included optional language delineated in the Model Order in
17 Sections 2.4, 2.5, 2.9, 2.16, 5.2, 7.3, 7.4, 9(b), and 10(c).

18 4. The parties met and conferred regarding their preferences for certain language in
19 Section 7.4 (Procedures for Approving or Objecting to Disclosure of “HIGHLY
20 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” or “HIGHLY CONFIDENTIAL – SOURCE
21 CODE” Information or Items to Designated House Counsel or Experts) and ultimately
22 compromised on one change not contemplated by the Model Order. Namely, the parties agreed
23 to shorten the time to object to disclosure of material designated as Highly Confidential—
24 Attorneys’ Eyes Only and/or Highly Confidential—Source Code in Section 7.4(b) from fourteen
25 days to seven days.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 3rd day of March, 2023 at San Francisco, California.

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4 /s/ Joseph R. Saveri
Joseph R. Saveri
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